PERMIT NO. 2631-247-0037-V-04-0 ISSUANCE DATE: DRAFT



ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit

Facility Name: Pratt Paper (GA), LLC

Facility Address: 1800A Sarasota Business Parkway

Conyers, Rockdale County

Mailing Address: 1800A Sarasota Business Parkway

Convers, Georgia 30013

Parent/Holding Company: Pratt Industries (U.S.A.), Inc.

Facility AIRS Number: 04-13-247-00037

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a Part 70 Permit for:

The operation of a waste paper recycling mill for the production of paperboard, and a corrugated paper and corrugated box manufacturing facility.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit. Unless modified or revoked, this Permit expires five years after the issuance date indicated above.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above, for any misrepresentation made in Title V Applications TV-63682 and TV-63787, both signed on July 31, 2017, any other applications upon which this Permit is based, supporting data entered therein or attached thereto, or any subsequent submittal of supporting data, or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **59** pages.



DRAFT

Richard E. Dunn, Director Environmental Protection Division

Permit No.: 2631-247-0037-V-04-0

Table of Contents

PART 1.0	FACILITY DESCRIPTION	1
1.1	Site Determination	1
1.2	Previous and/or Other Names	1
1.3	Overall Facility Process Description	1
PART 2.0	REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY	2
2.1	Facility Wide Emission Caps and Operating Limits	2
2.2	Facility Wide Federal Rule Standards	2
2.3	Facility Wide SIP Rule Standards	2
2.4	Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emis	
PART 3.0	Cap or Operating Limit	2 2
3.1	Emission Units	
3.1	Equipment Emission Caps and Operating Limits	
3.3	Equipment Federal Rule Standards	
3.4	Equipment SIP Rule Standards	
3.5	Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission	
3.3	or Operating Limit	_
PART 4.0	REQUIREMENTS FOR TESTING	
4.1	General Testing Requirements	
4.2	Specific Testing Requirements	
PART 5.0	REQUIREMENTS FOR MONITORING (Related to Data Collection)	
5.1	General Monitoring Requirements	
5.2	Specific Monitoring Requirements	
PART 6.0	RECORD KEEPING AND REPORTING REQUIREMENTS	
6.1	General Record Keeping and Reporting Requirements	
6.2	Specific Record Keeping and Reporting Requirements	
PART 7.0	OTHER SPECIFIC REQUIREMENTS	
7.1	Operational Flexibility	
7.2	Off-Permit Changes	
7.3	Alternative Requirements	
7.4	Insignificant Activities	
7.5	Temporary Sources	
7.6	Short-term Activities	
7.7	Compliance Schedule/Progress Reports	
7.8	Emissions Trading	
7.9	Acid Rain Requirements	
7.10	Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)	
7.11	Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)	
7.12	Revocation of Existing Permits and Amendments	
7.13	Pollution Prevention	
7.14	Specific Conditions	
PART 8.0	GENERAL PROVISIONS	
8.1	Terms and References	
8.2	EPA Authorities	
8.3	Duty to Comply	
8.4	Fee Assessment and Payment	
	•	

8.5	Permit Renewal and Expiration	45
8.6	Transfer of Ownership or Operation	45
8.7	Property Rights	45
8.8	Submissions	46
8.9	Duty to Provide Information	46
8.10	Modifications	47
8.11	Permit Revision, Revocation, Reopening and Termination	47
8.12	Severability	48
8.13	Excess Emissions Due to an Emergency	48
8.14	Compliance Requirements	49
8.15	Circumvention	51
8.16	Permit Shield	51
8.17	Operational Practices	52
8.18	Visible Emissions	52
8.19	Fuel-burning Equipment	52
8.20	Sulfur Dioxide	53
8.21	Particulate Emissions	53
8.22	Fugitive Dust	53
8.23	Solvent Metal Cleaning	54
8.24	Incinerators	55
8.25	Volatile Organic Liquid Handling and Storage	55
8.26	Use of Any Credible Evidence or Information	56
8.27	Internal Combustion Engines	
8.28	Boilers and Process Heaters	
_		

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

Permit No.: 2631-247-0037-V-04-0

Pratt Paper (GA), LLC Permit No.: 2631-247-0037-V-04-0

PART 1.0 FACILITY DESCRIPTION

1.1 Site Determination

Pratt Paper (GA), LLC (AFS No. 247-00037) is comprised of what was three separately permitted facilities - Visy Paper, Inc. (AFS No. 247-00037), Jet Corr, Inc. (AFS No. 247-00047), and Jet Corr II, Inc. (AFS No. 247-00052). The equipment and processes from Jet Corr II, Inc. were moved to Jet Corr Inc, and its permit was revoked on October 18, 2016. Jet Corr manufactures corrugated paper sheets (SIC code 2679) while Visy Paper produces recycled linerboard and medium paperboard (SIC code 2631). These three facilities were considered one Part 70 source because they are under common control, located on contiguous and/or adjacent property, and have the same 2-digit SIC code. They are owned and managed by Pratt Industries (U.S.A.), Inc.

1.2 Previous and/or Other Names

Visy Paper, Inc, Jet Corr, Inc. Jet Corr II, Inc.

1.3 Overall Facility Process Description

Visy Paper, Inc. manufactures paperboard from waste paper. The manufacturing process begins by "slushing" the waste paper in hot water to break the waste into fibrous paper stock. The stock is then washed, screened, and separated from impurities. Next, the stock is treated with conditioners and delivered to the head box of the paper machine. At the head box, the stock is sprayed onto a forming fabric, compressed into shape, and then transferred to a felt. While being conveyed by the felt, the stock is dried by heated nips, dyed, and then dried again. At the end of the process, the finished paperboard is removed from the felt, rolled, and cut. The final product is either sold to the customers or distributed to Jet Corr, Inc., which is located next door.

Jet Corr receives rolls of paper from Visy Paper and converts the rolls into corrugated sheets on a Corrugator (ID No. JC02) through the use of a starch based adhesive. Three sheets of paper are joined by fluting the center sheet, applying starch to the tips of the flutes, and then adding the outside sheets by applying pressure and drying the adhesive. The product is trimmed and cut to size. The trim is recovered, baled, and recycled into the paper making process. The corrugated sheets are either packed for shipping or are converted into boxes for delivery to clients. The boxes are manufactured using flexo folder gluers and rotary die cutters. The facility also operates equipment for the printing and manufacturing of displays under the name Pratt Displays, a sub-division of Jet Corr, Inc.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

- 2.1.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire site, any single hazardous air pollutant (HAP) which is listed in Section 112 of the Clean Air Act, in an amount equal to or exceeding 10 tons during any consecutive twelve-month period, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any consecutive twelve-month period.

 [Avoidance of 40 CFR 63 Subpart DDDDD]
- 2.1.2 The Permittee shall not discharge or cause the discharge into the atmosphere from the equipment listed in Permit Condition 7.14.1, carbon monoxide (CO) emissions in amounts equal to or greater than 100 tons during any consecutive twelve-month period. [Avoidance of 40 CFR 52.21]
- 2.1.3 The Permittee shall not discharge or cause the discharge into the atmosphere from the equipment listed in Permit Condition 7.14.1, sulfur dioxide (SO₂) emissions in amounts equal to or greater than 100 tons during any consecutive twelve-month period. [Avoidance of 40 CFR 52.21]
- 2.1.4 The Permittee shall not discharge or cause the discharge into the atmosphere from the equipment listed in Permit Condition 7.14.1, nitrogen oxides (NO_x) emissions in amounts equal to or greater than 100 tons during any consecutive twelve-month period. [391-3-1-.03(8)(c)13.(iii)]
- 2.1.5 The Permittee shall not discharge or cause the discharge into the atmosphere from the equipment listed in Permit Condition 7.14.2, nitrogen oxides (NO_x) emissions in amounts equal to or greater than 50 tons during any consecutive twelve-month period.

 [Avoidance of Non-Attainment Area New Source Review (NAA-NSR)]

2.2 Facility Wide Federal Rule Standards

None applicable

2.3 Facility Wide SIP Rule Standards

None applicable

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1 Emission Units

Emission Units		Applicable	Air Pollution Control Devices	
ID No.	Description	Requirements/Standards	ID No.	Description
Visy Pape				
PI01	Biomass Boiler	40 CFR 51.165 40 CFR 52.21 40 CFR 60 Subpart Db 40 CFR 63 Subpart JJJJJJ	PIC1 PIC2	Baghouse Sodium Bicarbonate Addition System
		391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(tt) 391-3-102(2)(yy)	PIC4	NOx Reduction System (SNCR or SCR)
VP01	Nebraska Boiler	40 CFR 52.21 40 CFR 60 Subpart Db 391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(yy)	None	None
VP02	Paper Machine	391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(tt)	None	None
VP03	Generic Fuel Burning Equipment (with a rated heat capacity less than 10 MMBtu/hr burning only natural gas excluding AMU1 – AMU4)	391-3-102(2)(d)	None	None
VP04	Hurst Boiler	40 CFR 60 Subpart Dc 391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(lll)	None	None
AMU1 through AMU4	Heaters #1 -#4	391-3-102(2)(d)	None	None
Jet Corr,	Ino			
JC02	Corrugator	391-3-102(2)(b) 391-3-102(2)(e)	None	None
JC03	20.9 MMBtu/hr Cleaver Brooks Boiler	40 CFR 60 Subpart Dc 391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(lll)	None	None
JC04	Fulton Boiler	391-3-102(2)(d) 391-3-102(2)(g)	None	None
JC05	Generic Fuel Burning Equipment (with a rated heat capacity less than 10 MMBtu/hr burning only natural gas)	391-3-102(2)(d)	None	None
JC06	37.12 MMBtu/hr Cleaver Brooks Boiler	40 CFR 60 Subpart Dc 391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(III)	None	None

Emission Units		Applicable	Air P	Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
FM01	Flexo Folder Gluer	NAA-NSR Avoidance	None	None
FM12	Flexo Folder Gluer	391-3-102(2)(b)		
FM15	Preprint Press	391-3-102(2)(e)		
FM17	Flexo Folder Gluer	391-3-102(2)(mm)		
FM18	Labeler/Laminator	391-3-102(2)(tt)		
FM19	Flat Bed Die Cutter			
FM20	Flat Bed Die Cutter			
FM22	Rotary Die Cutter			
FM24	Marten 3-Color Rotary Die Cutter			
FM02	Flexo Folder Gluer	391-3-102(2)(b)	None	None
FM03	Rotary Die Cutter	391-3-102(2)(e)		
FM04	Rotary Die Cutter	391-3-102(2)(mm)		
FM05	Flexo Folder Gluer	391-3-102(2)(tt)		
FM06	Flexo Folder Gluer			
FM07	Flexo Folder Gluer			
FM23	Flexo Folder Gluer	NAA-NSR Avoidance	None	None
		391-3-102(2)(b)		
		391-3-102(2)(e)		
		391-3-102(2)(mm)		
		391-3-102(2)(tt)		
FM25	Ward 4-Color Flexo-Folder Gluer	391-3-102(2)(b)	None	None
FM26	Ward 4-Color Flexo-Folder Gluer	391-3-102(2)(e)		
FM28	Bobst 4-Color Flexo-Folder Gluer	391-3-102(2)(mm)		
FM27	Ward 3-Color Rotary Die Cutter	391-3-102(2)(tt)		
FM29	Ward 3-Color Rotary Die Cutter			

^{*} Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

3.2 Equipment Emission Caps and Operating Limits

- 3.2.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the Biomass Boiler (ID No. PI01), any emissions which contain VOC in amounts equal to or greater than 10.8 tons during any consecutive twelve-month period.

 [Avoidance of Non-Attainment Area NSR and 391-3-1-.02(2)(tt)]
- 3.2.2 The Permittee shall not discharge, nor cause the discharge, into the atmosphere from the Biomass Boiler (ID No. PI01), any emissions which contain NO_X in amounts equal to or greater than 0.07 pounds per MMBtu input, as based on a 30-day rolling average. The Permittee shall operate the Biomass Boiler with good combustion control techniques at all times.

[BACT and 391-3-1-.02(2)(yy); 40 CFR 60.44b(1)(1) and 391-3-1-.02(2)(d)4(iii) Subsumed]

3.2.3 The Permittee shall not discharge or cause the discharge into the atmosphere VOC emissions from the Flexo Folder Gluers (ID Nos. FM01, FM12, and FM17), Rotary Die Cutters (ID Nos. FM22 and FM24), Preprint Press (ID No. FM15), the Labeler/Laminator (ID No. FM18), and the Flat Bed Die Cutters (ID Nos. FM19 and FM20) in excess of 15.31 tons during any consecutive twelve-month period.

[Avoidance of Non-Attainment Area NSR]

- 3.2.4 The Permittee shall not discharge or cause the discharge into the atmosphere VOC emissions from the Flexo Folder Gluer ID No. FM23 in excess of 11.03 tons during any consecutive twelve-month period.

 [Avoidance of Non-Attainment Area NSR]
- 3.2.5 The Permittee shall not burn any fuel other than natural gas and/or distillate fuel oil in the Hurst Boiler and 37.12 MMBtu/hr Cleaver Brooks Boiler (ID Nos. VP04 and JC06). These Boilers may burn distillate fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing, maintenance, or operator training on liquid fuel, as defined in 40 CFR 63.11237. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year. [Avoidance of Non-Attainment Area NSR, Avoidance of 40 CFR 52.21, Avoidance of 40 CFR 63 Subpart JJJJJJ, and 40 CFR 63.11195(e)]
- 3.2.6 The Permittee shall burn natural gas exclusively in the 20.9 MMBtu/hr Cleaver Brooks Boiler (ID No. JC03) during the calendar months of May through September.

 [Avoidance of Non-Attainment Area NSR and Avoidance of 40 CFR 52.21]
- The Permittee shall not discharge, nor cause the discharge, into the atmosphere from the Nebraska Boiler (ID No. VP01), any emissions which contain NO_X in amounts greater than 17.04 tons during any consecutive twelve-month period.
 [Generation of Emission Reduction Credits for Non-Attainment NSR and Avoidance of Non-Attainment Area NSR]

3.3 Equipment Federal Rule Standards

- 3.3.1 The Permittee shall be subject to all applicable provisions of Federal Standard 40 CFR Part 60, Subpart A "General Provisions." [40 CFR 60 Subpart A]
- 3.3.2 The Permittee shall comply with all applicable provisions of 40 CFR Part 60, Subpart Db "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units" for the Nebraska Boiler and the Biomass Boiler (ID Nos. VP01 and PI01). [40 CFR 60 Subpart Db; 40 CFR 60.40b]
- 3.3.3 The Permittee shall comply with all applicable provisions of 40 CFR Part 60, Subpart Dc "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" for the Hurst Boiler, 20.9 MMBtu/hr Cleaver Brooks Boiler, and 37.12 MMBtu/hr Cleaver Brooks Boiler (ID Nos. VP04, JC03, and JC06). [40 CFR 60 Subpart Dc; 40 CFR 60.40c(a)]
- 3.3.4 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the Biomass Boiler (ID No. PI01) any emissions which:
 - a. Contain particulate matter in excess of 0.03 pounds per MMBtu heat input. The particulate matter standard applies at all time, except during periods of startup, shutdown, or malfunction.

 [40 CFR 60.43b(h)(1) and 40 CFR 60.43b(g); 391-3-1-.02(2)(d)2.(iii) Subsumed]

- b. Contain sulfur dioxide in excess of 0.20 pounds per MMBtu heat input, as averaged over a rolling 30-day period. [40 CFR 60.42b(k) and 40 CFR 60.42b(g); 391-3-1-.02(2)(g)1.(ii) Subsumed]
- c. Exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard applies at all times, except during periods of startup, shutdown, or malfunction. [40 CFR 60.43b(f), 40 CFR 60.43b(g) and 391-3-1-.02(2)(d)3.; 391-3-1-.02(2)(b)1. Subsumed]
- 3.3.5 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the Nebraska Boiler (ID No. VP01) any emissions which contain NO_X in excess of 0.20 pounds per MMBtu heat input. The NO_X standard shall apply at all times including periods of startup, shutdown, and malfunction of the boiler.

 [40 CFR 60.44b(1)(2)(ii), 391-3-1-.02(2)(d)4., and 391-3-1-.02(2)(yy)]
- 3.3.6 The Permittee shall comply with all applicable provisions of 40 CFR Part 63, Subpart JJJJJJ "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources" and the applicable provisions of 40 CFR 63 Subpart A, "General Provisions," as specified in Table 8 to 40 CFR 63 Subpart JJJJJJ for the Biomass Boiler (ID No. PI01).

 [40 CFR 63 Subpart JJJJJJ]

3.4 Equipment SIP Rule Standards

3.4.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from all applicable listed equipment in Section 3.1 of this Permit, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.

[391-3-1-.02(2)(b)1.]

- 3.4.2 The Permittee shall not cause, let, suffer, permit or allow any emissions from Heaters #1 #4 (ID Nos. AMU1 AMU4) or the units in Equipment Group VP03, which contain fly ash and/or other particulate matter in amounts equal to or exceeding 0.5 pounds per MMBtu. [391-3-1-.02(2)(d)2.(i)]
- 3.4.3 The Permittee shall not cause, let, suffer, permit or allow the emissions from Hurst Boiler, Fulton Boiler, 20.9 MMBtu/hr Cleaver Brooks Boiler, and 37.12 MMBtu/hr Cleaver Brooks Boiler (ID Nos. VP04, JC04, JC03, and JC06), or the units in Equipment Group JC05, which contain fly ash and/or other particulate matter in amounts equal to or exceeding the rate derived from:

[391-3-1-.02(2)(d)2.(ii)]

 $P = 0.5(10/R)^{0.5}$

Where: R equals heat input rate in million BTU per hour, and

P equals the allowable emission rate in pounds per million BTU

3.4.4 The Permittee shall not cause, let, suffer, permit or allow the emissions from Nebraska Boiler (ID No. VP01) which contain fly ash and/or other particulate matter in amounts equal to or exceeding 0.10 pounds per MMBtu heat input. [391-3-1-.02(2)(d)2.(iii)]

3.4.5 The Permittee shall not cause, let, suffer, permit or allow the emissions from all applicable equipment listed in Section 3.1 of this Permit which exhibit visible emissions, the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.

[391-3-1-.02(2)(d)3.]

3.4.6 The Permittee shall not cause, let, permit, suffer, or allow the rate of emissions of all applicable listed equipment in Section 3.1 of this Permit, particulate matter in total quantities equal to or exceeding the allowable rate calculated as follows:

[391-3-1-.02(2)(e)1.(i)]

 $E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour $E = 55 P^{0.11} - 40$; for process input weight rate above 30 tons per hour

Where:

E = emission rate in pounds per hour

P = process input weight rate in tons per hour, excluding moisture

For purpose of determining compliance with this Condition, each individual Equipment ID No. is a separate process under Rule (e).

3.4.7 The Permittee shall not burn fuel containing more than 3 percent sulfur, by weight, in the Biomass Boiler (ID No. PI01), unless the sulfur dioxide abatement equipment (ID No. PIC2) is in operation.

[391-3-1-.02(2)(g)2.]

3.4.8 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in the Hurst Boiler (ID No. VP04), unless otherwise specified by the Director. [391-3-1-.02(2)(g)2.]

3.4.9 The Permittee shall not cause, let, suffer, permit, or allow the emissions of nitrogen oxides (NO_X) from 20.9 MMBtu/hr Cleaver Brooks Boiler, 37.12 MMBtu/hr Cleaver Brooks Boiler, or Hurst Boiler (ID Nos. JC03, JC06, and VP04) to exceed 30 ppm at 3% O₂ on a dry basis during the period May 1 through September 30 of each year. [391-3-1-.02(2)(lll)1.(i) and 391-3-1-.02(2)(yy)]

3.4.10 The Permittee shall use only inks and coatings in packaging rotogravure and flexographic printing operations with VOC content, as applied, equal to or less than one of the following:

[391-3-1-.02(2)(mm)1.(i)]

a. 25 percent by volume of the volatile content of the coating or ink; or

40 percent by volume of the coating or ink, minus water, or

b.

- Permit No.: 2631-247-0037-V-04-0
- c. 0.5 pounds of VOC per pound of coating solids.
- 3.4.11 The emission limits of Condition No. 3.4.10 shall be achieved by implementing the following options. The Permittee may apply any of the compliance options to an individual ink/coating, or to an entire printing line. However, the Permittee may not use different compliance options at the same time on the same printing line.

 [391-3-1-.02(2)(mm)2.]
 - a. The application of low solvent technology where each and every ink and coating meet the appropriate limits stated in Condition No. 3.4.10; or
 - b. Averaging on a 24-hour weighted basis the VOC content of all inks and coatings, as applied, on a single printing line, where the average does not exceed the limits stated in Condition 3.4.10; averaging across lines is not allowed.
- 3.4.12 The Permittee shall maintain the following housekeeping requirements for any affected cleaning operation subject to the emission limitations in Condition 3.4.10: [391-3-1-.02(2)(mm)4.]
 - a. Store all VOC-containing cleaning materials and used shop towels in closed containers;
 - b. Ensure that storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;
 - c. Minimize spills of VOC-containing cleaning materials;
 - d. Convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and
 - e. Minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers
- 3.4.13 The Permittee shall take reasonable precautions to minimize spills during the handling and transfer of dyes and felt cleaners containing volatile organic compounds (VOC) from containers, tanks, vats, vessels, and piping systems.

 [391-3-1-.02(2)(tt) and 391-3-1-.03(2)(c)]
- 3.4.14 The Permittee shall store dyes and felt cleaners containing VOC in sealed containers. [391-3-1-.02(2)(tt) and 391-3-1-.03(2)(c)]
- 3.4.15 All VOC waste containers shall be equipped with tight fitting lids. [391-3-1-.02(2)(tt) and 391-3-1-.03(2)(c)]

- 3.4.16 The Permittee shall not use any adhesive in Flexo Folder Gluer ID Nos. FM01, FM02, FM05, FM06, and FM07 unless the VOC content of the adhesive is equal to or less than 1 percent, by weight.

 [391-3-1-.02(2)(tt)]
- 3.4.17 The Permittee shall not burn any fuel other than natural gas in Nebraska Boiler (ID No. VP01), 20.9 MMBtu/hr Cleaver Brooks Boiler (ID No. JC03), Heaters #1 #4 (ID Nos. AMU1 AMU4), the units in Equipment Group VP03, Fulton Boiler (ID No. JC04) or in Equipment Group JC05.

 [391-3-1-.03(2)(c); 391-3-1-.02(2)(g)2. Subsumed]

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

- 3.5.1 The Permittee shall maintain an inventory of filter bags such that an adequate supply of bags are hand to replace any defective bags in the Biomass Boiler Baghouse (ID No. PIC1). [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 3.5.2 The Permittee shall take all reasonable precautions in order to minimize spills and evaporation of VOC-containing cleaning solutions, and shall store all VOC-laden cleaning materials including shop towels, rags and mop heads in covered containers immediately after use, and dispose of the materials by acceptable means. The covered containers must be designed to adequately contain vapors and must be in good working condition. [391-3-1-.02(2)(a)10.]

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division ("Division"). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.

 [391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

 [391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:
 - a. Method 1 shall be used for the determination of sample point locations,
 - b. Method 2 shall be used for the determination of stack gas flow rate,
 - c. Method 3 or 3A shall be used for the determination of stack gas molecular weight,
 - d. Method 3B shall be used for the determination of the emissions rate correction factor or excess air. Method 3A may be used as an alternative;
 - e. Method 4 shall be used for the determination of stack gas moisture,
 - f. Method 5 shall be used for the determination of particulate matter concentration,
 - g. Method 7 or 7E shall be used for the determination of NO_X emissions,
 - h. Method 9 and the procedures contained in Section 1.3 of the above reference document shall be used for the determination of opacity,
 - i. Method 10 shall be used for the determination of CO concentration,
 - j. Method 19 shall be used, when applicable, to convert particulate matter, CO, SO₂, and NO_X concentrations (i.e. grains/dscf for PM, ppm for gaseous pollutants), as determined using other methods specified in this section, to emission rates (i.e. lb/MMBtu) or to calculate SO₂ removal efficiency.
 - k. ASTM D4057 shall be used for the collection of fuel oil samples,

- Permit No.: 2631-247-0037-V-04-0
- 1. Method 19, Section 12.5.2.2.3, shall be used for the determination of fuel oil sulfur content,
- m. Method 24 for the determination of volatile matter content, water content, density, volume solids, and weight solids of surface coatings,
- n. Method 24A for the determination of volatile matter content and density of printing inks and related coatings,
- o. Method 25 for the measurement of VOC emissions from the Biomass Boiler (Source Code PI01),
- p. Method 29 for the measurement of HAP emissions from the Biomass Boiler (Source Code PI01),
- q. Method 26 or 26A for the measurement of HCl emissions from the Biomass Boiler (Source Code PI01), and
- r. Method 6 or 6c shall be used for the determination of SO₂ from the Biomass Boiler (Source Code PI01).

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard. [391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

4.2 Specific Testing Requirements

4.2.1 The Permittee shall conduct performance tests as specified by the following table and criteria unless otherwise specified by the Division:
[391-3-1-.02(2)(a)10.]

Equipment	Pollutant	Frequency
Biomass Boiler (ID No. PI01)	Particulate Matter	Annual

- a. Data from these tests shall be used to establish the operational parameters as specified in Condition 6.1.7.c. Data from a previously approved performance test which demonstrated compliance with the applicable emission limit may be used to establish the operational parameters in lieu of the most recent performance tests as long as such previous performance test is representative of current operations of the emission unit and was conducted during the five years prior to the most recent performance test.
- b. The Permittee shall submit with the quarterly report required by Condition 6.1.4 a list of all the current operational parameters established in accordance with this condition for the purpose of reporting under Condition 6.1.7.c.

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.1 General Monitoring Requirements

5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.

[391-3-1-.02(6)(b)1]

5.2 Specific Monitoring Requirements

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
 - a. Continuous Emissions Monitoring Systems (CEMS) for measuring and recording the NO_X concentration (in ppm NO_X), CO concentration (in ppm CO), SO₂ concentration (in ppm SO₂), and diluent concentration (in either oxygen or dioxide, percent) discharged to the atmosphere from the Biomass Boiler (ID No. PI01). The one-hour NO_X, CO, and SO₂ emissions rates measured by the CEMS shall be converted to and recorded as pounds per MMBtu heat input.

[40 CFR 60.48b and 391-3-1-.03(8)(c)13.(iii); Avoidance of 40 CFR 52.21 for CO and SO_2]

b. A Continuous Opacity Monitoring System (COMS) for measuring and recording the opacity of the visible emissions when firing the Bubbling Fluidized Bed Boiler of the Biomass Boiler (ID No. PI01).
 [40 CFR 60.48b(a)]

- c. A bag leak detection system for the Biomass Boiler Baghouse (ID No. PIC1). [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- d. CEMS for measuring and recording NO_X concentration (in ppm NO_X), CO concentration (in ppm CO), and diluent concentration (in either oxygen or carbon dioxide, percent) discharged to the atmosphere from the Nebraska Boiler (ID No. VP01). The one-hour average NO_X and CO emissions rates measured by the system shall be expressed in pound per MMBtu heat input.

[40 CFR 60.48b(b), 391-3-1-.02(2)(d)4, 391-3-1-.02(2)(yy), and Avoidance of 40 CFR 52.21 for CO]

- 5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

 [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
 - a. Feed rate of lime or sodium bicarbonate and fuel feed rate to the Biomass Boiler (ID No. PI01). Data shall be recorded once per hour for at least 75 percent of the hours each day that the Bubbling Fluidized Bed Boiler of the Biomass Boiler is in operation.
 - [40 CFR 60.42b(k), 391-3-1-.02(2)(g) and (tt), and Avoidance of Non-Attainment NSR]
- 5.2.3 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

- a. The quantity of natural gas, in cubic feet, burned in the 20.9 MMBtu/hr Cleaver Brooks Boiler (ID No. JC03). Data shall be recorded monthly. [40 CFR 60.48c(g)(2)]
- 5.2.4 For the Biomass Boiler (ID No. PI01), the Permittee shall determine compliance with the SO₂ emission standard of Condition 3.3.4.b using emissions data as measured and recorded in accordance with Condition 5.2.1.a. The 30-day averages for the SO₂ emission rate shall be determined using the procedures specified by 40 CFR 60.45b(c)(2), (3), (4), and (5). [40 CFR 60.45b(c), (g), and (h)]
- For the Biomass Boiler (ID No. PI01), the Permittee shall determine compliance with the NO_X emission standard specified in Condition 3.2.2 using emissions data as measured and recorded in accordance with Condition 5.2.1.a on a continuous basis through the use of a 30-day rolling average emission rate. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all the hourly NO_X emissions data for the preceding 30 steam generating unit operating days. [40 CFR 60.46b(e)(2)]
- 5.2.6 For the purpose of this Permit, the definition of a steam generating unit operating day for the Biomass Boiler and Nebraska Boiler (ID Nos. PI01 and VP01) shall be any 24-hour period between 12:00 midnight and the following midnight (00:00 hours through 24:00 hours) during which any fuel is combusted at any time in the steam generating unit. It is not necessary for the fuel to be combusted continuously for the entire 24-hour period. [40 CFR 60.41b]

- 5.2.7 The Permittee shall obtain the following:
 - a. NO_X, CO, and SO₂ emissions data for the Biomass Boiler (ID No. PI01) for at least 75 percent of the operating hours for at least 22 out of 30 successive days in which the Bubbling Fluidized Bed Boiler is in operation.

 [40 CFR 60.47b(c) and 40 CFR 60.48b(f)]

Permit No.: 2631-247-0037-V-04-0

NO_X and CO emission data for the Nebraska Boiler (ID No. VP01) for at least 75 percent of the operating hours for at least 22 out of 30 successive boiler operating days.
 [40 CFR 60.48b(f)]

If this minimum data requirement is not met, the Permittee shall supplement the emissions data with data collected using Method 7 or 7E for NO_X, Method 10 for CO, Method 6c for SO₂, or other approved reference test methods used as a standby monitoring system providing the minimum data requirement defined in this condition. [40 CFR 60.48b(f), 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]

- 5.2.8 The Permittee shall, for the NO_X, CO, and SO₂ CEMs installed on the Biomass Boiler (ID No. PI01) and the for the NO_X and CO CEMs installed on the Nebraska Boiler (ID No. VP01), perform daily calibration drift tests (assessments) and data accuracy assessments in accordance with Procedure 1 (Appendix F) of the Division's *Procedures for Testing and Monitoring Sources of Air Pollutants* and 40 CFR Part 60.

 [391-3-1-.02(6)(b)1., 40 CFR 70.6(a)(3)(i), 40 CFR 60.13, and Appendix F to 40 CFR 60]
- 5.2.9 The Permittee shall implement and maintain a Preventive Maintenance Program for the Biomass Boiler Baghouse (ID No. PIC1) to assure that the provisions of Conditions 3.3.4.a and 3.3.4.c are met. The program shall be subject to review and, if necessary to assure compliance, modification by the Division and shall include the pressure drop ranges that indicate proper operation for the baghouse. At a minimum, the following operation and maintenance checks shall be made on at least a weekly basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log: [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
 - a. Record the pressure drop across the baghouse and ensure that it is within the appropriate range.
 - b. For a baghouse equipped with a compressed air cleaning system, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.
 - c. For a baghouse equipped with a reverse air cleaning system, check the system for proper operation. This may include checking damper, bypass, and isolation valves for proper operation.

d. For a baghouse equipped with a shaker cleaning system, check the system for proper operation. This may include checking shaker mechanism for loose or worn bearings, drive components, mounting; proper operation of outlet/isolation valves; proper lubrication.

Permit No.: 2631-247-0037-V-04-0

- e. Check dust collector hoppers and conveying systems for proper operation.
- 5.2.10 The following pollutant specific emission unit (PSEU) is subject to the Compliance Assurance Monitoring (CAM) Rule in 40 CFR 64.

Emission Unit	Pollutant
Biomass Boiler (ID No. PI01)	NO_X

Permit conditions in this permit for the PSEU(s) listed above with regulatory citation 40 CFR 70.6(a)(3)(i) are included for the purpose of complying with 40 CFR 64. In addition, the Permittee shall meet the requirements, as applicable, of 40 CFR 64.7, 64.8, and 64.9. [40 CFR 64]

5.2.11 The Permittee shall comply with the performance criteria listed in the table below for the NO_X emissions from the Biomass Boiler (ID No. PI01): [40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]		Indicator No. 1
A.	Data Representation [64.3(b)(1)]	Continuous Emissions Monitor (CEM) for NOx
В.	Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	The NO _x CEM will be installed according to the manufacturer's installation specifications and certification requirements for Performance Specification 2.
C.	QA/QC Practices and Criteria [64.3(b)(3)]	In addition to the daily drift tests (assessments) and data accuracy assessments required by Condition 5.2.7, the NO _X CEM will undergo annual RATA evaluations pursuant to 40 CFR Part 60, Appendix F.
D.	Monitoring Frequency [64.3(b)(4)]	Continuous: readings will be taken and recorded at a minimum frequency of once every fifteen minutes.
	Data Collection Procedures [64.3(b)(4)]	The data will be recorded electronically.
	Averaging Period [64.3(b)(4)]	The values for each consecutive 30-day period will be averaged to determine whether an excursion has occurred.

5.2.12 The Permittee shall install, calibrate, maintain, and operate a natural gas consumption meter on the Nebraska Boiler (ID No. VP01) for measuring and recording the hourly fuel usage (cubic feet per hour for natural gas). The natural gas meter shall be calibrated according to manufacturer's specifications and schedule. The natural gas meter calibration shall be conducted at least once per year.

[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

5.2.13 For the Nebraska Boiler (ID No. VP01), the Permittee shall determine compliance with the NO_X emission limitation specified in Condition 3.3.5 using emissions data acquired by the continuous monitoring system required by Condition 5.2.1.d. Compliance shall be determined on a continuous basis through the use of a 30-day rolling average emission rate. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO_X emission data for the preceding 30 steam generating unit operating days. The 1-hour average NO_X emission rates (lb/MM BTU), required by this condition, must include at least 2 data points to calculate each 1-hour average. An hourly NO_X emission rate is not calculated if the boiler is operated less than 30 minutes in a 1-hour period and is not counted toward the determination of a steam generating unit operating day.

[40 CFR 60.13(h), 40 CFR 60.44b(i), 40 CFR 60.46b(e)(2), and 40 CFR 60.48b(d)]

5.2.14 The Permittee shall conduct an inspection at least once per day of operation in order to verify compliance with the requirements of Conditions 3.4.13, 3.4.14, 3.4.15, and 3.4.16. A log of the inspections shall be maintained in a permanent form suitable for inspection by or submittal to the Division.

[391-3-1-.02(2)(tt)and 391-3-1-.03(2)(c)]

5.2.15 The Permittee shall, each calendar year, monitor emissions of nitrogen oxides (NO_X) from the Hurst Boiler, 20.9 MMBtu/hr Cleaver Brooks Boiler or 37.12 MMBtu/hr Cleaver Brooks Boiler (ID Nos. VP04, JC03, and JC06) unless the boiler will not operate during the ozone season (May 1 through September 30 of each year) by performing a tune-up for each boiler to demonstrate compliance with the NO_X concentration limit of Condition No. 3.4.9 using the following procedures:

[391-3-1-.02(6)(b)1. and PTM Section 2.119]

- a. The tune-up shall be performed no earlier than March 1 and no later than May 1 of each calendar year. In the case of initial startups that occur after May 1 but before September 30, tune-ups shall be performed no later than 120 hours after startup. The tune-up shall be performed at the normal maximum operating load expected during the period from May 1 to September 30 of each year.
- b. The tune-up shall be performed by using the manufacturer recommended settings for reduced NO_X emissions or by using a NO_X analyzer. Adjustments shall be made, as needed, so that NO_X emissions are reduced in a manner consistent with good combustion practices and safe fuel-burning equipment operation.

c. Following the adjustments, or determination that adjustments are not required, the Permittee shall perform a measurement consisting of a minimum of three test runs to demonstrate that the average emissions are less than or equal to the NO_X concentration limit of Condition No. 3.4.9. Each test run shall be a minimum of 30 minutes of operational data in length. Following any test run which results in an average NO_X concentration that exceeds the NO_X limit of Condition No. 3.4.9, the Permittee shall make adjustments to the boiler and conduct a new set of test runs within one day. Subsequent adjustments followed by test runs shall be continued until the average of 3 consecutive test runs do not exceed the NO_X concentration limit of Condition No. 3.4.9.

Permit No.: 2631-247-0037-V-04-0

- d. All measurements of NO_X and oxygen concentrations in paragraphs b. and c. of this condition shall be conducted using procedures of the American Society for Testing and Materials (ASTM) Standard Test Method for Determination of NO_X, Carbon Monoxide (CO), and Oxygen Concentrations in Emissions from Natural Gas-Fired Reciprocating Engines, Combustion Turbines, Boilers, and Process Heaters Using Portable Analyzers, ASTM D 6522; procedures of Gas Research Institute Method GRI-96/0008, EPA/EMC Conditional Test Method (CTM-30) Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Emissions from Natural Gas-Fired Engines, Boilers and Process Heaters Using Portable Analyzers; or procedures of EPA Reference Method 7E and 3A.
- e. The Permittee shall maintain records of all tune-ups performed in accordance with this condition. These records shall include the following:
 - i. date and time the tune-up was performed
 - ii. the boiler settings for each test run
 - iii. the average NOx concentration (in ppm at 3 percent O₂, dry basis) for each test run
 - iv. what operating parameters were adjusted to minimize NOx emissions
 - v. an explanation of how the final (compliant) settings were determined
- f. Following the tune-up, from the period May 1 through September 30 of each year, the Permittee shall operate each affected boiler using the settings determined during the annual tune-up. If no parameters can be monitored to indicate the performance of a specific boiler, the Permittee shall certify that no adjustments have been made to the boiler by the Permittee and/or any third party since the most recent successful tune-up was completed. This certification shall be made in writing no later than October 15 of each year and shall be maintained with the records required by paragraph e. of this condition.

g. If a boiler is capable of operating for 3 consecutive test runs with average NO_X concentrations of less than or equal to 15 ppm corrected to 3 percent oxygen, the Permittee may conduct the next subsequent tune-up in the fourth calendar year following the demonstration of 15 ppm or less. Results of measurements of NO_X and oxygen concentrations and tune-ups, maintenance and records, and subsequent boiler operation shall otherwise be conducted as described in paragraphs a. through f. of this condition. The Permittee shall continue to make annual certifications of no adjustments since the previous tune-up.

Permit No.: 2631-247-0037-V-04-0

- h. As an alternative to complying with the requirements in this condition, the Permittee shall submit documentation no later than April 30 of each year confirming that an affected unit will not operate during the months of May through September. As a minimum, the documentation shall include the identification of the facility, the permit number, and the specific affected units that will not be operated.
- 5.2.16 The Permittee shall adhere to the following work practice plan: [391-3-1-.02(2)(tt); 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]
 - Reasonable precautions shall be taken to minimize spills during the handling and transfer of cleaners containing VOCs from containers, tanks, vats, vessels, and piping systems.
 - b. Cleaners containing VOC shall be stored in sealed containers.
 - c. All VOC waste containers shall be equipped with tight fitting lids.

The Permittee shall conduct an inspection at least once per day of operation concerning paragraphs (b) and (c) of this condition. A log of the inspections shall be maintained in a permanent form suitable for inspection by or submitted to the Division.

- 5.2.17 The Permittee shall conduct a monthly inspection to assess compliance with the filter bag supply requirements of Condition 3.5.1. The Permittee shall maintain an inspection log recorded in a permanent form suitable for inspection and submission to the Division. [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 5.2.18 The Permittee shall conduct tune-ups on Biomass Boiler (ID No. PI01) biennially. Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. The tune-ups must be conducted while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. All tune-ups will be conducted using the following procedures:

 [40 CFR 63.11223(b) and 40 CFR 63.11210(h)]
 - a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).

b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

Permit No.: 2631-247-0037-V-04-0

- c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the Permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_X requirement to which the unit is subject.
- e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- f. Maintain on-site and submit, if requested by the Division, a report containing the following:
 - i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - ii. A description of any corrective actions taken as a part of the tune-up of the boiler.
 - iii. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the boiler was physically and legally capable of using more than one type of fuel during that period. Boilers sharing a fuel meter may estimate the fuel use by each boiler.
- g. If the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

Pratt Paper (GA), LLC Permit No.: 2631-247-0037-V-04-0

PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

6.1.1 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.

[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)]

6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

[391-3-1-.03(10)(d)1.(i) and 40 CFR 70.6(a)(3)(iii)(B)]

6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each quarterly period ending March 31, June 30, September 30, and December 31 of each year. All reports shall be postmarked by May 30, August 29, November 29, and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.

c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.

Permit No.: 2631-247-0037-V-04-0

- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- 6.1.5 Where applicable, the Permittee shall keep the following records: [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]
 - a. The date, place, and time of sampling or measurement;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
- 6.1.6 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6 (a)(3)(ii)(B)]

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
 - i. Any incidence of SO₂ emissions, measured and recorded in accordance with Condition 5.2.1.a, from the Biomass Boiler (ID No. PI01) in which the concentration exceeds 0.2 pound per MMBtu heat input, as averaged over a rolling 30-day period while firing solid fuels.

 [40 CFR 60.42b(k) and 40 CFR 60.42b(g)]
 - ii. Any incidence of NO_X emissions, measured and recorded in accordance with Condition 5.2.1.a, from the Biomass Boiler (ID No. PI01) in which the concentration exceeds 0.07 lb per MMBtu heat input, as averaged over a rolling 30-day period.

 [BACT and 391-3-1-.02(2)(yy)]
 - iii. Any opacity from the Biomass Boiler (ID No. PI01), measured and recorded in accordance with Condition 5.2.1.b, in excess of the quantities allowed by Condition 3.3.4.c.
 [391-3-1-.02(2)(d)3. and 40 CFR 60.49b(h)(3)]
 - iv. Any 30-day rolling average NO_X emission rate from the Nebraska Boiler (ID No. VP01), measured and recorded in accordance with Condition 5.2.1.d, which exceeds 0.2 lb per MMBtu. [40 CFR 60.49b(h)(4), 391-3-1-.02(2)(d)4, and 391-3-1-.02(2)(yy)]
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
 - i. Any consecutive twelve-month period in which NO_X emissions from the original facility as defined in Condition 7.14.2, as determined by Condition 6.2.6, equal or exceed 50 tons.

 [Avoidance of Non-Attainment Area NSR]
 - ii. Any consecutive twelve-month period in which HAP emissions from the entire Part 70 site, calculated in accordance with Condition 6.2.2, equal or exceed 10 tons for any individual HAP or 25 tons for any combination of HAPs. [Avoidance of 40 CFR 63 Subpart DDDDD]

iii. Any consecutive twelve-month period in which NO_X emissions from the entire Part 70 site, as defined in Condition 7.14.1, calculated in accordance with Condition 6.2.7, equal or exceed 100 tons.

Permit No.: 2631-247-0037-V-04-0

[391-3-1-.03(8)(c)13.(iii)]

iv. Any consecutive twelve-month period in which SO₂ emissions from the entire Part 70 site, as defined in Condition 7.14.1, calculated in accordance with Condition 6.2.7, equal or exceed 100 tons.

[Avoidance of 40 CFR 52.21]

v. Any consecutive twelve-month period in which CO emissions from the entire Part 70 site, as defined in Condition 7.14.1, calculated in accordance with Condition 6.2.7, equal or exceed 100 tons.

[Avoidance of 40 CFR 52.21]

vi. Any consecutive twelve-month period in which VOC emissions from the Biomass Boiler (ID No. PI01), calculated in accordance with Condition 6.2.10, equal or exceed 10.8 tons.

[Avoidance of Non-Attainment Area NSR and 391-3-1-.02(2)(tt)]

- vii. Any period of process operation during which the sulfur content of the fuel fired in the Biomass Boiler (ID No. PI01) exceeds 3 percent, by weight, while the sulfur dioxide abatement equipment (ID No. PIC2) is not in operation. [391-3-1-.02(2)(g)2.]
- viii. Any failure to initiate corrective action within 1 hour of an alarm from the bag leak detection system on the Biomass Boiler Baghouse (ID No. PIC1). [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- ix. Any consecutive twelve-month period in which NO_X emissions from the Nebraska Boiler (ID No. VP01), calculated in accordance with Condition 6.2.14, exceed 17.04 tons.

[Generation of Emission Reduction Credits for Non-Attainment NSR and Avoidance of Non-Attainment Area NSR]

x. Any period of process operation during which the fuel fired in Heaters #1 - #4 (ID Nos. AMU1 – AMU4) or the units in Equipment Group VP03 is a fuel other than natural gas.

[391-3-1-.03(2)(c)]

xi. Any period during which the fuel burned in the Nebraska Boiler, 20.9 MMBtu/hr Cleaver Brooks Boiler Fulton Boiler, Equipment Group JC05, or the 37.12 MMBtu/hr Clever Brooks Boiler (ID Nos. VP01, JC03, JC04, JC06) is other than natural gas.

[391-3-1-.03(2)(c)]

xii. Any period during which any adhesive used in Flexo Folder Gluer ID No. FM01, FM02, FM05, FM06, FM07, or FM23 has a VOC content greater than one percent by weight. [391-3-1-.02(2)(tt)]

xiii. Any consecutive twelve-month period for which the total VOC emissions, as determined from Condition 6.2.24.a, is equal to or greater than 15.31 tons. [Avoidance of Non-Attainment Area NSR]

- xiv. Any consecutive twelve-month period for which the total VOC emissions, as determined from Condition 6.2.24.b is equal to or greater than 11.03 tons. [Avoidance of Non-Attainment Area NSR]
- xv. During the calendar months of May through September, any NO_X emission from the Hurst Boiler, 20.9 MMBtu/hr Cleaver Brooks Boiler, or 37.12 MMBtu/hr Cleaver Brooks Boiler (ID Nos. VP04, JC03 and JC06), measured in accordance with the requirements of Condition 5.2.18, that exceed 30 ppm @ 3% O₂ on a dry basis. [391-3-1-.02(2)(lll)]
- xvi. The use of any applicable ink or coating equipment that has a VOC content exceeding the limits specified in Condition No. 3.4.10. [391-3-1-.02(2)(mm)1.(i)]
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
 - i. Any adverse condition (i.e. failure to comply with work practice standard) revealed by the inspection required by Condition 5.2.14. [391-3-1-.02(2)(tt) and 391-3-1-.03(2)(c)]
 - ii. Failure to maintain inventory of replacement baghouse bags for the Biomass Boiler Baghouse (ID No. PIC1). [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
 - iii. Failure to complete the operation and maintenance checks required by Condition 5.2.9 for the Biomass Boiler Baghouse (ID No. PIC1). [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
 - iv. Any adverse condition (i.e. failure to comply with work practice standard) revealed by the inspection required by Condition 5.2.16. [391-3-1-.02(2)(tt)]
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

i. Each emission total from the entire facility (as defined in Conditions 7.14.1 and 7.14.2) for each calendar month during the reporting period as calculated per Conditions 6.2.2, 6.2.6, and 6.2.7.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

ii. The fuel supplier certifications for each shipment of distillate fuel oil received during the reporting period and a statement signed by a responsible official that the records of fuel supplier certifications submitted represent all of the fuel oil combusted during the semiannual reporting period.

[40 CFR 60.48c(f), 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]

iii. Any failure to comply with the provisions of Condition 3.5.1, as detected by the inspection requirements of Condition 5.2.17.

[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

6.1.8 The Permittee shall provide the Division with a statement, in such form as the Director may prescribe, showing the actual emissions of nitrogen oxides and volatile organic compounds from the entire facility. These statements shall be submitted every year by the date specified in 391-3-1-.02(6)(a)4 and shall show the actual emissions of the previous calendar year.

[391-3-1-.02(6)(b)1.(i)]

6.2 Specific Record Keeping and Reporting Requirements

- 6.2.1 The Permittee shall submit with the quarterly reports required by Condition 6.1.4, the fuel supplier certifications for each shipment of fuel oil received during the reporting period and a statement signed by a responsible official that the records of fuel supplier certifications submitted represent all of the fuel oil combusted during the quarterly reporting period. If no fuel oil has been combusted during the reporting period, the report shall so state. [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.2 The Permittee shall maintain monthly records of the usage of all materials containing HAPs and all fuels burned and shall use such records and best available emission factors to calculate monthly mass emission rates of HAPs for the entire Part 70 site (defined as Visy Paper, Inc., Jet Corr, Inc., and Jet Corr II, Inc.). The monthly HAP mass emission rates shall be used to calculate rolling twelve month total mass emission rates for individual and aggregate HAPs for each consecutive twelve-month period. The monthly and annual HAP mass emission rates shall be expressed in terms of tons of pollutant per month or year. Records of the calculations shall be maintained in a form suitable for inspection by, or submittal to, the Division. The Permittee shall include in the quarterly reports required by Condition 6.1.4 a copy of the rolling twelve month total individual and aggregate HAP emissions for each consecutive twelve-month period that ends during the reporting quarter and notification of any calendar months in which the emissions of any individual HAP from the entire Part 70 site exceed 0.83 tons or the emissions of any combination of HAPs exceed 2.08 tons with an explanation of how compliance with the HAP emission limits in Condition 2.1.1 will be maintained.

[Avoidance of 40 CFR 63 Subpart DDDDD]

6.2.3 The Permittee shall use the following equation, the NO_X emission data from the monitoring system required by Conditions 5.2.1.a and 5.2.1.d; the fuel usage data from the fuel meters required by Conditions 5.2.2.a and 5.2.12; and records required by Condition 6.2.15, to calculate the daily NO_X mass emissions from the facilities as described by both Conditions 7.14.1 and 7.14.2:

[391-3-1-.03(8)(c)13.(iii), Avoidance of Non-Attainment Area NSR, and Generation of Emissions Reduction Credits for Non-Attainment NSR]

$$A = \sum_{i=1}^{24} [(B_i * C_i * D) + (E_i * F_i * G_i)] + (100 * NG)$$

Where:

A = daily NO_X mass emissions (lbs NO_X / day)

 B_i = hourly average NO_X emission rate (at the i^{th} hour) of the Nebraska boiler (ID No. VP01) determined by the continuous monitoring system (lbs NO_X /MMBtu heat input)

 C_i = hourly fuel consumption by the Nebraska boiler (ID No. VP01) (at the i^{th} hour, million ft³ per hour for natural gas)

D = heat content of fuel $(1,000 \text{ Btu per ft}^3 \text{ for natural gas})$

 E_i = hourly average NO_X emission rate (at the i^{th} hour) of the Bubbling Fluidized Boiler of the Biomass Boiler (ID. No PI01) determined by the continuous monitoring system (lbs NO_X/MMBtu heat input)

F_i = hourly fuel consumption by the Bubbling Fluidized Boiler of the Biomass Boiler (ID No. PI01) (pounds per hour)

 G_i = heat content of fuel consumed in the i^{th} hour (Btu per pound; may be derived from heat output and fuel feed rate, taking into consideration moisture content and boiler efficiency)

 $i = i^{th}$ hour of boiler operation during the day (from 1st to the 24th hour)

NG = The total amount of natural gas burned in Heaters #1 - #4 (ID Nos. AMU1 – AMU4) and the units in Equipment Group VP03 during the day and recorded in accordance with Condition 6.2.15 (in million ft³)

Records of the daily NO_X mass emission rate shall be maintained in a form suitable for inspection by, or submittal to, the Division.

In the event that emissions monitoring data (B_i in the equation above) are missing and/or invalid, the highest daily average NO_X emission rate observed during the previous calendar operating month shall be used to calculate the daily NO_X emission mass emission rate for each day that actual data is not available. The Division reserves the right to amend this method of handling missing and/or invalid data should the Division determine that a more appropriate method is necessary.

6.2.4 The Permittee shall use the following equation, the CO emission data from the monitoring system required by Conditions 5.2.1.a and 5.2.1.d; the fuel usage data from the fuel meters required by Conditions 5.2.2.a and 5.2.12; and records required by Condition 6.2.15, to calculate the daily CO mass emissions from the facility as described by Condition 7.14.1: [Avoidance of 40 CFR 52.21]

$$A = \sum_{i=1}^{24} [(B_i * C_i * D) + (E_i * F_i * G_i)] + (84 * NG)$$

Where:

A = daily CO mass emissions (lbs CO / day)

 B_i = hourly average CO emission rate (at the i^{th} hour) of the Nebraska Boiler (ID No. VP01) determined by the continuous monitoring system (lbs CO/MMBtu heat input)

 C_i = hourly fuel consumption by the Nebraska Boiler (ID No. VP01) (at the i^{th} hour, million ft³ per hour for natural gas)

D = heat content of fuel $(1,000 \text{ Btu per ft}^3 \text{ for natural gas})$

 E_i = hourly average CO emission rate (at the i^{th} hour) of the Bubbling Fluidized Boiler of the Biomass Boiler (ID No. PI01) determined by the continuous monitoring system (lbs CO/MMBtu heat input)

 F_i = hourly fuel consumption by the Bubbling Fluidized Boiler of the Biomass Boiler (ID No. PI01) (pounds per hour)

 G_i = heat content of fuel consumed by the Bubbling Fluidized Bed Boiler of the Biomass Boiler (ID No. PI01) in the ith hour (Btu per pound; may be derived from heat output and fuel feed rate, taking into consideration moisture content and boiler efficiency)

 $i = i^{th}$ hour of boiler operation during the day (from 1st to the 24th hour)

NG = The total amount of natural gas burned in Heaters #1 - #5 (ID Nos. AMU1 – AMU5) and the units in Equipment Group VP03 during the day and recorded in accordance with Condition 6.2.15 (in million ft³)

Records of the daily CO mass emission rate shall be maintained in a form suitable for inspection by, or submittal to, the Division.

In the event that emissions monitoring data (B_i in the equation above) are missing and/or invalid, the highest daily average CO emission rate observed during the previous calendar operating month shall be used to calculate the daily CO emission mass emission rate for each day that actual data is not available. The Division reserves the right to amend this method of handling missing and/or invalid data should the Division determine that a more appropriate method is necessary.

Permit No.: 2631-247-0037-V-04-0

6.2.5 The Permittee shall use the following equation, the SO₂ emission data from the monitoring system required by Conditions 5.2.1.a and 5.2.1.d; the fuel usage data from the fuel meters required by Conditions 5.2.2.a and 5.2.12; and records required by Condition 6.2.15, to calculate the daily SO₂ mass emissions from the facility as described by Condition 7.14.1: [Avoidance of 40 CFR 52.21]

Permit No.: 2631-247-0037-V-04-0

$$A = \sum_{i=1}^{24} [(B_i * C_i * D) + (E_i * F_i * G_i)] + (0.6 * NG)$$

Where:

A = daily SO_2 mass emissions (lbs SO_2 / day)

 B_i = SO₂ emission factor for fuel being burned during the *i*th hour in the Nebraska Boiler (ID No. VP01) determined by performance test results or obtained from the manufacturer or other appropriate source (lbs SO₂ / millions of cubic feet of natural gas)

 C_i = hourly fuel consumption by the Nebraska Boiler (ID No. VP01) (at the i^{th} hour, million ft³ per hour for natural gas)

 E_i = hourly average SO₂ emission rate (at the i^{th} hour) of the Bubbling Fluidized Boiler of the Biomass Boiler (ID No. PI01) determined by the continuous monitoring system (lbs SO₂ / MMBtu heat input)

F_i = hourly fuel consumption by the Bubbling Fluidized Boiler of the Biomass Boiler (ID No. PI01) (pounds per hour)

 G_i = heat content of fuel consumed by the Bubbling Fluidized Bed Boiler of the Biomass Boiler (ID No. PI01) in the i^{th} hour (Btu per pound; may be derived from heat output and fuel feed rate, taking into consideration moisture content and boiler efficiency)

 $i = i^{th}$ hour of boiler operation during the day (from 1^{st} to the 24^{th} hour)

NG = The total amount of natural gas burned in Heaters #1 - #4 (ID Nos. AMU1 – AMU4) and the units in Equipment Group VP03 during the day and recorded in accordance with Condition 6.2.15 (in million ft³)

Records of the daily SO₂ mass emission rate shall be maintained in a form suitable for inspection by, or submittal to, the Division.

In the event that emissions monitoring data (B_i in the equation above) are missing and/or invalid, the highest daily average SO_2 emission rate observed during the previous calendar operating month shall be used to calculate the daily SO_2 emission mass emission rate for each day that actual data is not available. The Division reserves the right to amend this method of handling missing and/or invalid data should the Division determine that a more appropriate method is necessary.

- 6.2.6 The Permittee shall use the NO_X emissions data and calculations required by Condition 6.2.3 to record the monthly emissions of NO_X from the Nebraska Boiler (ID No. VP01) and Heaters #1 #4 (ID Nos. AMU1 AMU4). The monthly NO_X mass emission rates shall be used to calculate rolling twelve-month total mass emission rates for NO_X for each consecutive twelve-month period. The monthly and annual NO_X mass emission rates shall be expressed in terms of tons of pollutant per month or year. The Permittee shall include in the quarterly report required by Condition 6.1.4 a copy of the rolling twelve-month total NO_X emissions for each consecutive twelve-month period that ends during the reporting quarter and notification of any calendar months in which NO_X emissions from the Nebraska Boiler and Heaters #1 #4 exceed 4.16 tons with an explanation of how compliance with the NO_X limit contained in Condition 2.1.5 will be maintained.

 [Avoidance of Non-Attainment Area NSR]
- 6.2.7 The Permittee shall use the daily NO_X, CO, and SO₂ mass emissions for the facility, as defined in Conditions 7.14.1 and 7.14.2, as determined in accordance with Conditions 6.2.3, 6.2.4, and 6.2.5, to calculate monthly NO_X , CO, and SO_2 mass emission rates for the facility for each calendar month. The monthly NO_X, CO, and SO₂ mass emission rates shall be used to calculate rolling twelve-month total mass emission rates for NO_X, CO, and SO₂ for each consecutive twelve-month period. The monthly and annual NO_X, CO, and SO₂ mass emission rates shall be expressed in terms of tons of pollutant per month or year. Records of the calculations shall be maintained in a form suitable for inspection by, or submittal to, the Division. The Permittee shall include in the quarterly reports required by Condition 6.1.4 a copy of the rolling twelve-month total NO_x, CO, and SO₂ emissions for each consecutive twelve-month period that ends during the reporting quarter and notification of any calendar month in which either NO_x, CO, or SO₂ emissions from the entire facility exceed 8.33 tons with an explanation of how compliance with the respective NO_x, CO, or SO₂ limits in Conditions 2.1.2, 2.1.3 and 2.1.4 will be maintained. [Avoidance of 40 CFR 52.21 and 391-3-1-.03(8)(c)13.(iii)]
- 6.2.8 The Permittee shall maintain records of the amounts of each fuel combusted during each day in the Biomass Boiler (ID No. PI01) and calculate the annual capacity factor for each fuel. The annual capacity factor is determined on a 12-month rolling basis with a new annual capacity factor calculated at the end of each calendar month. Records shall be available for inspection by or submission to the Division upon request. [391-3-1-.02(6)(b)1., 40 CFR 70.6(a)(3)(i), and 40 CFR 60.49b(d)]
- 6.2.9 The Permittee shall maintain the following records for the Biomass Boiler (ID No. PI01): [391-3-1-.02(6)(b)1., 40 CFR 70.6(a)(3)(i). and 40 CFR 60.49b(g)]
 - a. Calendar date:
 - b. The average hourly NO_X, SO₂, and CO emissions rates (in pounds per MMBtu heat input) measured;
 - c. The 30-day average NO_X, SO₂, and CO emissions rates (in pounds per MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured hourly NO_X, SO₂, and CO emissions rates for the preceding 30 steam generating unit operating days;

d. Identification of the steam generating unit operating days when the calculated 30-day average NO_X, emission rate is in excess of the NO_X, emission standard specified in Condition 3.2.2, with the reasons for such excess emissions as well as a description of corrective actions taken;

Permit No.: 2631-247-0037-V-04-0

- e. Identification of the steam generating unit operating days when the calculated 30-day average SO₂, emission rate is in excess of the SO₂ emission standard specified in Condition 3.3.4.b, with the reasons for such excess emissions as well as a description of corrective actions taken:
- f. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data, and a description of corrective actions taken;
- g. Identification of the times when emission data have been excluded from calculation of average emission rates and the reasons for excluding such data;
- h. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted;
- i. Identification of the times when the pollutant concentrations exceeded full span of the respective continuous monitoring systems;
- j. Description of any modification to the continuous monitoring systems that could affect the ability of the continuous monitoring systems to comply with Performance Specifications 2, 3 or 4;
- k. Results of daily CEMs drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1.
- 6.2.10 The Permittee shall calculate monthly mass emissions of VOC from the Biomass Boiler (ID No. PI01) using the fuel records maintained in accordance with Condition 5.2.2.a and best available VOC emission factors provided by the equipment manufacturer or other appropriate sources. The monthly VOC mass emission rate shall be expressed in terms of tons of pollutant per month. Records of the calculations shall be maintained in a form suitable for inspection by, or submittal to, the Division. The Permittee shall include in the quarterly report required by Condition 6.1.4 notification of any calendar months in which VOC emissions from the Biomass Boiler exceed 0.90 tons and shall provide an explanation of how compliance with the VOC limit contained in Condition 3.2.1 will be maintained. [Avoidance of Non-Attainment Area NSR and 391-3-1-.02(2)(tt)]
- 6.2.11 The Permittee shall conduct an analysis of each new fuel proposed to be burned in the Bubbling Fluidized Bed Reactor of the Biomass Boiler (ID No. PI01). Such tests shall analyze the fuel for HAP content, including metallic HAPs, and for sulfur content. Records of the tests shall be maintained in a form suitable for inspection by, or submittal to, the Division.

[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

- Permit No.: 2631-247-0037-V-04-0
- 6.2.12 The Permittee shall implement and maintain a bag leak detection system on the Biomass Boiler Baghouse (ID No. PIC1).

 [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.13 The Permittee shall maintain the following records for each boiler operating day for the Nebraska Boiler (ID No. VP01): [40 CFR 60.49b(g)]
 - a. Calendar date.
 - b. The average hourly NO_X emission rate (in pounds per MMBtu heat input) measured.
 - c. The 30-day average NO_X emissions rate (in pounds per MMBtu heat input) calculated at the end of each boiler operating day from the measured hourly nitrogen oxide emission rate for the preceding 30 boiler operating days.
 - d. Identification of the boiler operating days when the calculated 30-day average nitrogen oxides emission rate is in excess of the NO_X emission standard under Condition 3.3.5, with the reasons for such excess emissions as well as a description of corrective actions taken.
 - e. Identification of the boiler operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data, and a description of corrective actions taken.
 - f. Identification of the times when emission data have been excluded from calculation of average emission rates and the reasons for excluding data.
 - g. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.
 - h. Identification of the times when the pollutant concentrations exceeded full span of the continuous monitoring systems.
 - i. Description of any modification to the continuous monitoring systems that could affect the ability of the continuous monitoring system to comply with Performance Specifications 2 or 3.
 - j. Results of Daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1.

- 6.2.14 The Permittee shall use the NO_X emissions data and calculations required by Condition 6.2.3 to record the monthly emissions of NO_X from the Nebraska Boiler (ID No. VP01). The monthly NO_X mass emission rates shall be used to calculate rolling twelve-month total mass emission rates for NO_X for each consecutive twelve-month period. The monthly and annual NO_X mass emission rates shall be expressed in terms of tons of pollutant per month or year. The Permittee shall include in the quarterly report required by Condition 6.1.4 a copy of the rolling twelve-month total NO_X emissions for each consecutive twelve-month period that ends during the reporting quarter and notification of any calendar months in which NO_X emissions from the Nebraska Boiler exceed 1.42 tons with an explanation of how compliance with the NO_X limit contained in Condition 3.2.7 will be maintained. [Generation of Emission Reduction Credits for Non-Attainment NSR]
- 6.2.15 The Permittee shall maintain daily records of the consumption of natural gas burned in Heaters #1 #4 (ID Nos. AMU1 AMU4) and the units in Equipment Group VP03. [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i); 391-3-1-.03(2)(c)]
- 6.2.16 The Permittee shall record and maintain records of the amount of natural gas combusted in the Hurst Boiler and 20.9 MMBtu/hr Cleaver Brooks Boilers (ID Nos: VP04 and JC03) during each calendar month.

 [40 CFR 60.48c(g)(2), 391-3-1-.03(2)(c), and 40 CFR 70.6(a)(3)(i)(A)]
- 6.2.17 For each shipment of No. 2 fuel oil received for combustion in any source, the Permittee shall obtain from the supplier a statement certifying that the oil complies with the specifications of No. 2 fuel oil contained in ASTM D396 (Standard Specifications for Fuel Oils) and does not contain more than 0.5 percent sulfur, by weight.

 [40 CFR 60.48c(f), 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]
- 6.2.18 The Permittee shall record and maintain records of the amounts of natural gas combusted each month in the Fulton Boiler (ID No. JC04) and in Equipment Group JC05. Records shall be kept for five years after the date of record and be available for inspection by or submission to the Division upon request.

 [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.19 The Permittee shall maintain monthly records of all VOC-containing adhesives used in Flexo Folder Gluer ID Nos. FM01, FM02, FM05, FM06, and FM07. These records shall express the VOC content of each adhesive as percent by weight. The records shall contain the same information for any HAP-containing materials used in the equipment. These records shall be kept available for inspection or submittal for five (5) years from the date of record.

[391-3-1-.02(2)(tt), 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]

Permit No.: 2631-247-0037-V-04-0

years from the date of record.

6.2.20 The Permittee shall maintain monthly usage records of all VOC-containing inks and adhesives used in the Flexo Folder Gluers (ID Nos. FM01, FM12, FM17, and FM23); the Rotary Die Cutters (ID Nos. FM22 and FM24); the Preprint Press (ID No. FM15); the Labeler/Lamintor (ID No. FM18); the Flat Bed Die Cutters (ID Nos. FM19 and FM20); and the Corrugator (ID No. JC02). These records shall express the VOC content of each ink/adhesive as a percent by weight. All VOC contents of inks/adhesives used in the equipment listed in this condition shall be assumed to be emitted to the atmosphere. The records shall contain the same information for any HAP-containing materials used in the

[Avoidance of Non-Attainment Area NSR, 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]

equipment. These records shall be kept available for inspection or submittal for five (5)

- 6.2.21 The Permittee shall maintain monthly records of all VOC-containing adhesives used in Rotary Die Cutter ID Nos. FM03 and FM04. These records shall express the VOC content of each adhesive as percent by weight. The records shall contain the same information for any HAP-containing materials used in the equipment. These records shall be kept available for inspection or submittal for five (5) years from the date of record.

 [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.22 The Permittee shall use the monthly records required in Condition 6.2.20 to calculate the total VOC emissions from the Flexo Folder Gluers (ID Nos. FM01, FM12, and FM17); the Rotary Die Cutters (ID Nos. FM22 and FM24); the Preprint Press (ID No. FM15); the Labeler/Laminator (ID No. FM18); and the Flat Bed Die Cutters (ID Nos. FM19 and FM20) for each calendar month.

 [Avoidance of Non-Attainment Area NSR, 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]
- 6.2.23 The Permittee shall use the monthly records required in Condition 6.2.20 to calculate the total VOC emissions from the Flexo Folder Gluer (ID No. FM23) for each calendar month. [Avoidance of Non-Attainment Area NSR, 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]
- 6.2.24 The Permittee shall calculate and retain the following records regarding VOC emissions from the emission units specified in Conditions 3.2.3 and 3.2.4. A consecutive twelvementh period total shall be defined as the sum of a calendar month's total plus the totals for the previous eleven (11) consecutive months. The records shall be available for inspection or submittal to the Division upon request and contain:

[Avoidance of Non-Attainment Area NSR, 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]

- a. The total VOC emissions (tons) calculated as per Condition 6.2.22 for the consecutive twelve-month period ending at each calendar month in the semiannual reporting period.
- b. The total VOC emissions (tons) calculated as per Condition 6.2.23 for the consecutive twelve-month period ending at each calendar month in the semiannual reporting period.

6.2.26

Permit No.: 2631-247-0037-V-04-0

6.2.25 The Permittee shall submit, with the report required by Condition 6.1.4, a semiannual report that contains the following records. The records shall be available for inspection or submittal to the Division upon request and contain:

[Avoidance of Non-Attainment Area NSR, 391-3-1-.02(6)(b)1., and 40 CFR 70.6(a)(3)(i)]

- a. The total VOC emissions (tons) calculated in accordance with Condition 6.2.24.a for the consecutive twelve-month period ending at each calendar month in the semiannual reporting period.
- b. The total VOC emissions (tons) calculated in accordance with Condition 6.2.24.b for the consecutive twelve-month period ending at each calendar month in the semiannual reporting period.

At the end of each calendar month, the Permittee shall calculate and record monthly

emission totals discharged from Jet Corr, Inc. for each of the following pollutants: individual hazardous air pollutants (HAP), combined HAP, CO, SO₂, and NO_X. The HAP contribution from inking, gluing, and material usage shall be calculated based upon a material balance, assuming 100% loss of the HAP components in the raw materials and using the records maintained in Condition 6.2.20. The HAP, CO, SO₂, and NO_X contribution from the Fulton (ID No. JC04) and Equipment Group JC05 shall be calculated based upon the use of AP-42 factors, manufacturer's data (where applicable), and the records maintained in Condition 6.2.18. The HAP, CO, and SO₂ contribution from the 20.9 MMBtu/hr Cleaver Brooks Boiler (ID No. JC03) shall be calculated based upon the use of AP-42 factors and using the records from the meters required in Condition 5.2.3. The NO_X contribution from the Boiler shall be calculated based upon the latest emissions rate recorded in accordance with Condition 5.2.5 for natural gas firing during ozone season, or an AP-42 factor, and using the records from the meters required in Condition 5.2.3. [Avoidance of 40 CFR 63 Subpart DDDDD, Avoidance of 40 CFR 52.21, 391-3-1-

.03(8)(c)13.(iii), 391-3-1-.03(2)(c), and 40 CFR 70.6(a)(3)(i)(A)]

6.2.27 The Permittee shall report the monthly emission totals recorded in Conditions 6.2.25 and 6.2.26 with the semiannual report required by Condition 6.1.4. Records of all monthly emission totals, records of demonstration calculations, records of any factors used in the calculation of pollutant emissions, and other documentation shall be maintained. These records shall be kept available for inspection by or submittal to the Division for a period of five years following the date of record.

[Avoidance of 40 CFR 63 Subpart DDDDD, Avoidance of 40 CFR 52.21, 391-3-1-.03(8)(c)13.(iii), 391-3-1-.03(2)(c), and 40 CFR 70.6(a)(3)(i)(A)]

6.2.28 The Permittee shall maintain records of all tune-ups performed in accordance with Condition 5.2.15 for the Hurst Boiler, 20.9 MMBtu/hr Cleaver Brooks Boiler or 37.12 MMBtu/hr Cleaver Brooks Boiler (ID Nos. VP04, JC03, and JC06). These records shall include the following:

[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

- a. Date and time the tune-up was performed;
- b. The boiler settings for each test run;

c.

The average NO_x concentration (in ppm at 3% O₂, dry basis) for each test run;

- d. What operating parameters were adjusted to minimize NO_x emissions; and
- e. An explanation of how the final (compliant) settings were determined.
- 6.2.29 Per the requirements of Condition 5.2.15.e, the Permittee shall certify that no adjustments have been made to the Hurst Boiler, 20.9 MMBtu/hr Cleaver Brooks Boiler or 37.12 MMBtu/hr Cleaver Brooks Boiler (ID Nos. VP04, JC03, and JC06) by the Permittee and/or any third party since the most recent successful tune-up was completed. This certification shall be made in writing no later than October 15 of each year and shall be maintained with the records required by Condition 6.2.28.

 [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.30 The Permittee shall submit notification of the date of construction and actual startup of the 37.12 MMBtu/hr Cleaver Brooks Boiler (ID No. JC06), as provided by 40 CFR 60.7 of this part. This notification shall include all items specified in 40 CFR 60.48c(a). [40 CFR 60.48c(a)]
- 6.2.31 The Permittee shall record and maintain records of the amount of natural gas combusted in the 37.12 MMBtu/hr Cleaver Brooks Boiler (Source Code: JC06) during each calendar month.

 [40 CFR 60.48c(g)(2)]
- 6.2.32 The Permittee shall use the following records and calculation methods to demonstrate compliance with the VOC emission limits in Condition No. 3.4.10. All calculations used to determine compliance with Condition No. 3.4.10 shall be kept as part of the record. [391-3-1-.02(2)(mm), PTM Section 2.45, and 391-3-1-.02(6)(b)1.]
 - a. <u>Content Limit Option of Condition No. 3.4.10.a.</u>: The Permittee shall maintain a record of manufacturer formulation data (e.g., MSDS, CPDS, or Laboratory Content Analysis Reports) for each and every ink, coating and thinner, as received and calculations expressing the VOC content of each ink and coating, as delivered to the applicator, as pounds of VOC per gallon of coating.
 - b. Solids Equivalent Limit Option of Condition No. 3.4.10.b.: The Permittee shall maintain a record of the daily volume of each ink and coating used on each printing line and the records required by paragraph a. of this Condition to calculate the daily, volume-weighted average VOC content of all the inks and coatings applied on any specific line, expressed in pounds of VOC per gallon of coating solids delivered to an applicator, if using Condition No. 3.4.10.b. to comply with Condition No. 3.4.10. Calculations shall use the procedures specified in PTM Section 2.45.3(c)(1) or procedures approved in writing by the Division to determine the daily volume-weighted average solids equivalent limit.

6.2.33 The Permittee must prepare, by March 1 of each year, and submit to the Division, an annual compliance certification report for the previous calendar year containing the information specified below for Biomass Boiler (ID No. PI01). The Permittee must submit the report by March 15 if the facility had any deviations. For units that are subject only to a requirement to conduct a biennial tune-up according to 40 CFR 63.11223(a) and not subject to emission limits or operating limits, the Permittee may prepare only a biennial compliance report.

[40 CFR 63.11225(b)]

- a. Company name and address.
- b. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. This notification must include the following certification(s) of compliance and signed by a responsible official:
 - i. "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."
 - ii. For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
- c. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- 6.2.34 The Permittee shall maintain the following records for Biomass Boiler (ID No. PI01): [40 CFR 63.11225(c)]
 - a. A copy of each notification and report that the Permittee submitted to comply with 40 CFR 63 Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.
 - b. Records to document conformance with the work practices, emission reduction measures, and management practices required by Condition 5.2.18 and below.
 - i. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - ii. For each boiler required to conduct an energy assessment, the Permittee must keep a copy of the energy assessment report.
 - c. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

d. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

Permit No.: 2631-247-0037-V-04-0

6.2.35 The Permittee must maintain records for Biomass Boiler (ID No. PI01) in a form suitable and readily available for expeditious review. The facility must keep each record for 5 years following the date of each recorded action. The facility must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The facility may keep the records off site for the remaining 3 years.

[40 CFR 63.11225(d)]

PART 7.0 OTHER SPECIFIC REQUIREMENTS

7.1 **Operational Flexibility**

- 7.1.1 The Permittee may make Section 502(b)(10) changes as defined in 40 CFR 70.2 without requiring a Permit revision, if the changes are not modifications under any provisions of Title I of the Federal Act and the changes do not exceed the emissions allowable under the Permit (whether expressed therein as a rate of emissions or in terms of total emissions). For each such change, the Permittee shall provide the Division and the EPA with written notification as required below in advance of the proposed changes and shall obtain any Permits required under Rules 391-3-1-.03(1) and (2). The Permittee and the Division shall attach each such notice to their copy of this Permit.
 - [391-3-1-.03(10)(b)5 and 40 CFR 70.4(b)(12)(i)]
 - For each such change, the Permittee's written notification and application for a a. construction Permit shall be submitted well in advance of any critical date (typically at least 3 months in advance of any commencement of construction, Permit issuance date, etc.) involved in the change, but no less than seven (7) days in advance of such change and shall include a brief description of the change within the Permitted facility, the date on which the change is proposed to occur, any change in emissions, and any Permit term or condition that is no longer applicable as a result of the change.
 - b. The Permit shield described in Condition 8.16.1 shall not apply to any change made pursuant to this condition.

7.2 **Off-Permit Changes**

- 7.2.1 The Permittee may make changes that are not addressed or prohibited by this Permit, other than those described in Condition 7.2.2 below, without a Permit revision, provided the following requirements are met:
 - [391-3-1-.03(10)(b)6 and 40 CFR 70.4(b)(14)]
 - Each such change shall meet all applicable requirements and shall not violate any a. existing Permit term or condition.
 - b. The Permittee must provide contemporaneous written notice to the Division and to the EPA of each such change, except for changes that qualify as insignificant under Rule 391-3-1-.03(10)(g). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - The change shall not qualify for the Permit shield in Condition 8.16.1. c.
 - d. The Permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the Permit, and the emissions resulting from those changes.

7.2.2 The Permittee shall not make, without a Permit revision, any changes that are not addressed or prohibited by this Permit, if such changes are subject to any requirements under Title IV of the Federal Act or are modifications under any provision of Title I of the Federal Act. [Rule 391-3-1-.03(10)(b)7 and 40 CFR 70.4(b)(15)]

7.3 Alternative Requirements

[White Paper #2]

Not Applicable

7.4 Insignificant Activities

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

7.5 Temporary Sources

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

Not Applicable

7.6 Short-term Activities

(see Form D5 "Short Term Activities" of the Permit application and White Paper #1)

Not Applicable

7.7 Compliance Schedule/Progress Reports

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]

None applicable

7.8 Emissions Trading

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]

Not Applicable

7.9 Acid Rain Requirements

Not Applicable

7.10 Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)

[391-3-1-.02(10)]

- 7.10.1 When and if the requirements of 40 CFR Part 68 become applicable, the Permittee shall comply with all applicable requirements of 40 CFR Part 68, including the following.
 - a. The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.

- b. For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:
 - i. Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.

Permit No.: 2631-247-0037-V-04-0

- ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
- iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
- iv. Include a certification in the RMP as specified in 40 CFR 68.12(b)(4)
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
- d. For processes subject to Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically using RMP*eSubmit (information for establishing an account can be found at www.epa.gov/rmp/rmpesubmit). Electronic Signature Agreements should be mailed to:

MAIL

Risk Management Program (RMP) Reporting Center P.O. Box 10162 Fairfax, VA 22038

COURIER & FEDEX

Risk Management Program (RMP) Reporting Center CGI Federal 12601 Fair Lakes Circle Fairfax, VA 22033

Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance certification submitted in accordance with Condition 8.14.1.

Permit No.: 2631-247-0037-V-04-0

7.11 Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)

- 7.11.1 If the Permittee performs any of the activities described below or as otherwise defined in 40 CFR Part 82, the Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to 40 CFR 82.166. [Note: "MVAC-like appliance" is defined in 40 CFR 82.152.]
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- 7.11.2 If the Permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

Air Quality Permit and Amendment Number(s)	Dates of Original Permit or Amendment Issuance
2631-247-0037-V-03-0	January 31, 2013
2631-247-0037-V-03-1	June 24, 2016
2631-247-0037-V-03-2	July 9, 2019
2679-247-0047-V-04-0	January 31, 2013
2679-247-0047-V-04-1	October 18, 2016
2679-247-0047-V-04-3	June 13, 2017
2679-247-0047-V-04-4	May 11, 2018
2679-247-0047-V-04-5	July 29, 2019

7.13 Pollution Prevention

None applicable

7.14 Specific Conditions

7.14.1 The emission limitations listed in Permit Conditions 2.1.2, 2.1.3, and 2.1.4 are applicable to the following equipment only:

[Avoidance of 40 CFR 52.21 and 391-3-1-.03(8)(c)13.(iii)]

- a. Biomass Boiler (ID No. PI01)
- b. Nebraska Boiler (ID No. VP01)
- c. Heaters #1-#4 (ID Nos. AMU1 through AMU4)
- d. Generic Fuel Burning Equipment at Visy Paper (ID No. VP03)
- e. Natural gas-fired emergency generator (Onan 100 kW) at Visy Paper listed as insignificant equipment.
- f. 20.9 MMBtu/hr Cleaver Brooks Boiler (ID No. JC03)
- g. Fulton Boiler (ID No. JC04)
- h. Generic Fuel Burning Equipment at Jet Corr (ID No. JC05)
- i. Natural gas-fired emergency generator (Generac ~100 kW) at Jet Corr listed as insignificant equipment.
- 7.14.2 The emission limitation listed in Permit Condition 2.1.5 is applicable to the following equipment only:

[Avoidance of Nonattainment Area NSR]

- a. Nebraska Boiler (ID No. VP01)
- b. Heaters #1-#4 (ID Nos. AMU1 AMU4)

PART 8.0 GENERAL PROVISIONS

8.1 Terms and References

- 8.1.1 Terms not otherwise defined in the Permit shall have the meaning assigned to such terms in the referenced regulation.
- 8.1.2 Where more than one condition in this Permit applies to an emission unit and/or the entire facility, each condition shall apply and the most stringent condition shall take precedence. [391-3-1-.02(2)(a)2]

8.2 EPA Authorities

- 8.2.1 Except as identified as "State-only enforceable" requirements in this Permit, all terms and conditions contained herein shall be enforceable by the EPA and citizens under the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.

 [40 CFR 70.6(b)(1)]
- 8.2.2 Nothing in this Permit shall alter or affect the authority of the EPA to obtain information pursuant to 42 U.S.C. 7414, "Inspections, Monitoring, and Entry."

 [40 CFR 70.6(f)(3)(iv)]
- 8.2.3 Nothing in this Permit shall alter or affect the authority of the EPA to impose emergency orders pursuant to 42 U.S.C. 7603, "Emergency Powers." [40 CFR 70.6(f)(3)(i)]

8.3 Duty to Comply

- 8.3.1 The Permittee shall comply with all conditions of this operating Permit. Any Permit noncompliance constitutes a violation of the Federal Clean Air Act and the Georgia Air Quality Act and/or State rules and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. Any noncompliance with a Permit condition specifically designated as enforceable only by the State constitutes a violation of the Georgia Air Quality Act and/or State rules only and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application.

 [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(i)]
- 8.3.2 The Permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.

 [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(ii)]
- 8.3.3 Nothing in this Permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of Permit issuance. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(f)(3)(ii)]

8.3.4 Issuance of this Permit does not relieve the Permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Director or any other federal, state, or local agency.

[391-3-1-.03(10)(e)1(iv) and 40 CFR 70.7(a)(6)]

8.4 Fee Assessment and Payment

8.4.1 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."

[391-3-1-.03(9)]

8.5 Permit Renewal and Expiration

- 8.5.1 This Permit shall remain in effect for five (5) years from the issuance date. The Permit shall become null and void after the expiration date unless a timely and complete renewal application has been submitted to the Division at least six (6) months, but no more than eighteen (18) months prior to the expiration date of the Permit.

 [391-3-1-.03(10)(d)1(i), (e)2, and (e)3(ii) and 40 CFR 70.5(a)(1)(iii)]
- 8.5.2 Permits being renewed are subject to the same procedural requirements, including those for public participation and affected State and EPA review, that apply to initial Permit issuance.

[391-3-1-.03(10)(e)3(i)]

8.5.3 Notwithstanding the provisions in 8.5.1 above, if the Division has received a timely and complete application for renewal, deemed it administratively complete, and failed to reissue the Permit for reasons other than cause, authorization to operate shall continue beyond the expiration date to the point of Permit modification, reissuance, or revocation. [391-3-1-.03(10)(e)3(iii)]

8.6 Transfer of Ownership or Operation

8.6.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director. The new Permit may be processed as an administrative amendment if no other change in this Permit is necessary, and provided that a written agreement containing a specific date for transfer of Permit responsibility coverage and liability between the current and new Permittee has been submitted to the Division at least thirty (30) days in advance of the transfer.

[391-3-1-.03(4)]

8.7 Property Rights

8.7.1 This Permit shall not convey property rights of any sort, or any exclusive privileges. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iv)]

8.8 Submissions

8.8.1 Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to:

Georgia Department of Natural Resources Environmental Protection Division Air Protection Branch Atlanta Tradeport, Suite 120 4244 International Parkway Atlanta, Georgia 30354-3908

8.8.2 Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to:

Air and Radiation Division
Air Planning and Implementation Branch
U. S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

8.8.3 Any application form, report, or compliance certification submitted pursuant to this Permit shall contain a certification by a responsible official of its truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[391-3-1-.03(10)(c)2, 40 CFR 70.5(d) and 40 CFR 70.6(c)(1)]

8.8.4 Unless otherwise specified, all submissions under this permit shall be submitted to the Division only.

8.9 Duty to Provide Information

- 8.9.1 The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Permit application, shall promptly submit such supplementary facts or corrected information to the Division.

 [391-3-1-.03(10)(c)5]
- 8.9.2 The Permittee shall furnish to the Division, in writing, information that the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall also furnish to the Division copies of records that the Permittee is required to keep by this Permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA, if necessary, along with a claim of confidentiality. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(v)]

8.10 Modifications

8.10.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.

[391-3-1-.03(1) through (8)]

8.11 Permit Revision, Revocation, Reopening and Termination

8.11.1 This Permit may be revised, revoked, reopened and reissued, or terminated for cause by the Director. The Permit will be reopened for cause and revised accordingly under the following circumstances:

[391-3-1-.03(10)(d)1(i)]

a. If additional applicable requirements become applicable to the source and the remaining Permit term is three (3) or more years. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original permit or any of its terms and conditions has been extended under Condition 8.5.3;

[391-3-1-.03(10)(e)6(i)(I)]

b. If any additional applicable requirements of the Acid Rain Program become applicable to the source;

[391-3-1-.03(10)(e)6(i)(II)] (Acid Rain sources only)

c. The Director determines that the Permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or

[391-3-1-.03(10)(e)6(i)(III) and 40 CFR 70.7(f)(1)(iii)]

d. The Director determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.

[391-3-1-.03(10)(e)6(i)(IV) and 40 CFR 70.7(f)(1)(iv)

8.11.2 Proceedings to reopen and reissue a Permit shall follow the same procedures as applicable to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable.

[391-3-1-.03(10)(e)6(ii)]

8.11.3 Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Director at least thirty (30) days in advance of the date the Permit is to be reopened, except that the Director may provide a shorter time period in the case of an emergency.

[391-3-1-.03(10)(e)6(iii)]

8.11.4 All Permit conditions remain in effect until such time as the Director takes final action. The filing of a request by the Permittee for any Permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, shall not stay any Permit condition.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iii)]

- 8.11.5 A Permit revision shall not be required for changes that are explicitly authorized by the conditions of this Permit.
- 8.11.6 A Permit revision shall not be required for changes that are part of an approved economic incentive, marketable Permit, emission trading, or other similar program or process for change which is specifically provided for in this Permit.

 [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(8)]

8.12 Severability

8.12.1 Any condition or portion of this Permit which is challenged, becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this Permit.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(5)]

8.13 Excess Emissions Due to an Emergency

- 8.13.1 An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

 [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(1)]
- 8.13.2 An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the Permittee demonstrates, through properly signed contemporaneous operating logs or other relevant evidence, that:

[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(2) and (3)]

- a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
- b. The Permitted facility was at the time of the emergency being properly operated;

c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in the Permit; and

Permit No.: 2631-247-0037-V-04-0

- d. The Permittee promptly notified the Division and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 8.13.3 In an enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

 [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(4)]
- 8.13.4 The emergency conditions listed above are in addition to any emergency or upset provisions contained in any applicable requirement.

 [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(5)]

8.14 Compliance Requirements

8.14.1 Compliance Certification

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and

e. Any additional requirements specified by the Division.

8.14.2 Inspection and Entry

a. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Division to perform the following:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(2)]

- i. Enter upon the Permittee's premises where a Part 70 source is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this Permit; and
- iv. Sample or monitor any substances or parameters at any location during operating hours for the purpose of assuring Permit compliance or compliance with applicable requirements as authorized by the Georgia Air Quality Act.
- b. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for Permit revocation and assessment of civil penalties. [391-3-1-.07 and 40 CFR 70.11(a)(3)(i)]

8.14.3 Schedule of Compliance

- a. For applicable requirements with which the Permittee is in compliance, the Permittee shall continue to comply with those requirements.

 [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(A)]
- b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]
- c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

8.14.4 Excess Emissions

a. Excess emissions resulting from startup, shutdown, or malfunction of any source which occur though ordinary diligence is employed shall be allowed provided that: [391-3-1-.02(2)(a)7(i)]

Permit No.: 2631-247-0037-V-04-0

- i. The best operational practices to minimize emissions are adhered to;
- ii. All associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and
- iii. The duration of excess emissions is minimized.
- b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of Chapter 391-3-1 of the Georgia Rules for Air Quality Control.

 [391-3-1-.02(2)(a)7(ii)]
- c. The provisions of this condition and Georgia Rule 391-3-1-.02(2)(a)7 shall apply only to those sources which are not subject to any requirement under Georgia Rule 391-3-1-.02(8) New Source Performance Standards or any requirement of 40 CFR, Part 60, as amended concerning New Source Performance Standards.

 [391-3-1-.02(2)(a)7(iii)]

8.15 Circumvention

State Only Enforceable Condition.

8.15.1 The Permittee shall not build, erect, install, or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of the pollutants in the gases discharged into the atmosphere.

[391-3-1-.03(2)(c)]

8.16 Permit Shield

- 8.16.1 Compliance with the terms of this Permit shall be deemed compliance with all applicable requirements as of the date of Permit issuance provided that all applicable requirements are included and specifically identified in the Permit.

 [391-3-1-.03(10)(d)6]
- 8.16.2 Any Permit condition identified as "State only enforceable" does not have a Permit shield.

8.17 Operational Practices

8.17.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.

[391-3-1-.02(2)(a)10]

State Only Enforceable Condition.

8.17.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.

[391-3-1-.02(2)(a)1]

8.18 Visible Emissions

8.18.1 Except as may be provided in other provisions of this Permit, the Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.

[391-3-1-.02(2)(b)1]

8.19 Fuel-burning Equipment

- 8.19.1 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, in operation or under construction on or before January 1, 1972 in amounts equal to or exceeding 0.7 pounds per million BTU heat input. [391-3-1-.02(2)(d)]
- 8.19.2 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, constructed after January 1, 1972 in amounts equal to or exceeding 0.5 pounds per million BTU heat input.

 [391-3-1-.02(2)(d)]

8.19.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any fuel-burning equipment constructed or extensively modified after January 1, 1972, visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity. [391-3-1-.02(2)(d)]

8.20 Sulfur Dioxide

8.20.1 Except as may be specified in other provisions of this Permit, the Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source that has a heat input capacity below 100 million Btu's per hour.

[391-3-1-.02(2)(g)]

8.21 Particulate Emissions

8.21.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any source, particulate matter in total quantities equal to or exceeding the allowable rates shown below. Equipment in operation, or under construction contract, on or before July 2, 1968, shall be considered existing equipment. All other equipment put in operation or extensively altered after said date is to be considered new equipment.

[391-3-1-.02(2)(e)]

a. The following equations shall be used to calculate the allowable rates of emission from new equipment:

 $E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour. $E = 55P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

b. The following equation shall be used to calculate the allowable rates of emission from existing equipment:

$$E = 4.1P^{0.67}$$

In the above equations, E = emission rate in pounds per hour, and P = process input weight rate in tons per hour.

8.22 Fugitive Dust

[391-3-1-.02(2)(n)]

- 8.22.1 Except as may be specified in other provisions of this Permit, the Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
 - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

Permit No.: 2631-247-0037-V-04-0

- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open bodied trucks transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.
- 8.22.2 The opacity from any fugitive dust source shall not equal or exceed 20 percent.

8.23 Solvent Metal Cleaning

- 8.23.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser subject to the requirements of Georgia Rule 391-3-1-.02(2)(ff) "Solvent Metal Cleaning" unless the following requirements for control of emissions of the volatile organic compounds are satisfied: [391-3-1-.02(2)(ff)1]
 - a. The degreaser shall be equipped with a cover to prevent escape of VOC during periods of non-use,
 - b. The degreaser shall be equipped with a device to drain cleaned parts before removal from the unit,
 - c. If the solvent volatility is 0.60 psi or greater measured at 100 °F, or if the solvent is heated above 120 °F, then one of the following control devices must be used:
 - i. The degreaser shall be equipped with a freeboard that gives a freeboard ratio of 0.7 or greater, or
 - ii. The degreaser shall be equipped with a water cover (solvent must be insoluble in and heavier than water), or
 - iii. The degreaser shall be equipped with a system of equivalent control, including but not limited to, a refrigerated chiller or carbon adsorption system.
 - d. Any solvent spray utilized by the degreaser must be in the form of a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which will not cause excessive splashing, and

e. All waste solvent from the degreaser shall be stored in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.

Permit No.: 2631-247-0037-V-04-0

8.24 Incinerators

- 8.24.1 Except as specified in the section dealing with conical burners, no person shall cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", in amounts equal to or exceeding the following:

 [391-3-1-.02(2)(c)1-4]
 - a. Units with charging rates of 500 pounds per hour or less of combustible waste, including water, shall not emit fly ash and/or particulate matter in quantities exceeding 1.0 pound per hour.
 - b. Units with charging rates in excess of 500 pounds per hour of combustible waste, including water, shall not emit fly ash and/or particulate matter in excess of 0.20 pounds per 100 pounds of charge.
- 8.24.2 No person shall cause, let, suffer, permit, or allow from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.
- 8.24.3 No person shall cause or allow particles to be emitted from an incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" which are individually large enough to be visible to the unaided eye.
- 8.24.4 No person shall operate an existing incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" unless:
 - a. It is a multiple chamber incinerator;
 - b. It is equipped with an auxiliary burner in the primary chamber for the purpose of creating a pre-ignition temperature of 800°F; and
 - c. It has a secondary burner to control smoke and/or odors and maintain a temperature of at least 1500°F in the secondary chamber.

8.25 Volatile Organic Liquid Handling and Storage

8.25.1 The Permittee shall ensure that each storage tank subject to the requirements of Georgia Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.

[391-3-1-.02(2)(vv)(1)]

8.26 Use of Any Credible Evidence or Information

8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[391-3-1-.02(3)(a)]

8.27 Internal Combustion Engines

- 8.27.1 For diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005, the Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A "General Provisions" and 40 CFR 60 Subpart IIII "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines." Such requirements include but are not limited to:

 [40 CFR 60.4200]
 - a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart IIII.
 - b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart IIII.
 - c. Conduct engine maintenance prescribed by the engine manufacturer in accordance with Subpart IIII.
 - d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart IIII. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
 - e. Maintain any records in accordance with Subpart IIII
 - f. Maintain a list of engines subject to 40 CFR 60 Subpart IIII, including the date of manufacture.[391-3-1-.02(6)(b)]
- 8.27.2 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A "General Provisions" and 40 CFR 60 Subpart JJJJ "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engines(s) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006.

 [40 CFR 60.4230]

8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."

For diesel-fired emergency generator engines defined as "existing" in 40 CFR 63 Subpart ZZZZ (constructed prior to June 12, 2006 for area sources of HAP, constructed prior to June 12, 2006 for ≤500hp engines at major sources, and constructed prior to December 19, 2002 for >500hp engines at major sources of HAP), such requirements (if applicable) include but are not limited to: [40 CFR 63.6580]

- [40 CI K 03.0300]
- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart ZZZZ.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart ZZZZ.
- c. Conduct the following in accordance with Subpart ZZZZ.
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first
 - ii. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first and replace as necessary
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart ZZZZ. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- e. Maintain any records in accordance with Subpart ZZZZ
- f. Maintain a list of engines subject to 40 CFR 63 Subpart ZZZZ, including the date of manufacture.[391-3-1-.02(6)(b)]

8.28 Boilers and Process Heaters

8.28.1 If the facility/site is an area source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart JJJJJJ - "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers."

[40 CFR 63.11193]

8.28.2 If the facility/site is a major source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart DDDDD - "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters."
[40 CFR 63.7480]

Attachments

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

Pratt Paper (GA), LLC

ATTACHMENT A

List Of Standard Abbreviations

AIRS	Aerometric Information Retrieval System	
APCD	Air Pollution Control Device	
A CITTA E	A CONTRACTOR OF THE STATE OF TH	
ASTM	American Society for Testing and Materials	
BACT	Best Available Control Technology	
BTU	British Thermal Unit	
CAAA	Clean Air Act Amendments	
CEMS	Continuous Emission Monitoring System	
CERMS	Continuous Emission Rate Monitoring System	
CFR	Code of Federal Regulations	
CMS	Continuous Monitoring System(s)	
СО	Carbon Monoxide	
COMS	Continuous Opacity Monitoring System	
dscf/dscm	Dry Standard Cubic Foot / Dry Standard Cubic	
	Meter	
EPA	United States Environmental Protection Agency	
EPCRA	Emergency Planning and Community Right to	
	Know Act	
gr	Grain(s)	
GPM (gpm)	Gallons per minute	
H ₂ O (H2O)	Water	
HAP	Hazardous Air Pollutant	
HCFC	Hydro-chloro-fluorocarbon	
MACT	Maximum Achievable Control Technology	
MMBtu	Million British Thermal Units	
MMBtu/hr	Million British Thermal Units per hour	
MVAC	Motor Vehicle Air Conditioner	
MW	Megawatt	
NESHAP	National Emission Standards for Hazardous Air	
	Pollutants	
NO _x (NOx)	Nitrogen Oxides	
NSPS	New Source Performance Standards	
OCGA	Official Code of Georgia Annotated	

PM	Particulate Matter
	Particulate Matter less than 10 micrometers in
PM ₁₀	
(PM10)	diameter
PPM (ppm)	Parts per Million
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂ (SO2)	Sulfur Dioxide
USC	United States Code
VE	Visible Emissions
VOC	Volatile Organic Compound

Permit No.: 2631-247-0037-V-04-0

List of Permit Specific Abbreviations

AFPI	Alternative Fuel Power Island
CAM	Compliance Assurance Monitoring
HCl	Hydrochloric Acid
NSR	New Source Review

PSEU	Pollutant Specific Emission Unit
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
NAA	Non-Attainment Area

ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity Only for plant		
Mobile Sources	Cleaning and sweeping of streets and paved surfaces			
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	Approx. quarterly		
	2. Small incinerators that are not subject to any standard, limitation or other requirement under			
	Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated			
	facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for			
	Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:			
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.			
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.			
	iii) Less than 4 million BTU/hr heat input firing type 4 waste.			
	(Refer to 391-3-103(10)(g)2.(ii) for descriptions of waste types)			
	3. Open burning in compliance with Georgia Rule 391-3-102 (5).	Only for plant maintenance		
	4. Stationary engines burning:			
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-102(2)(mmm).7	1		
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.			
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.			
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.			
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	Only for plant maintenance		
Maintenance, Cleaning, and Housekeeping	Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.			
1 0	2. Portable blast-cleaning equipment.			
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.			
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	2		
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	Only for plant maintenance		
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.			
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.			

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	1
g	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where	
	combined daily emissions from all operations are not individually major or are support facilities not	
	making significant contributions to the product of a collocated major manufacturing facility.	
Pollution	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment	
Control	subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or	
	other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement	
	under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112	
Industrial	(excluding 112(r)) of the Federal Act. 1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less	
Operations	than 125,000 tons per year.	
• F	2. Any of the following processes or process equipment which are electrically heated or which fire natural	
	gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per	
	hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-	1
	coated parts. ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000	
	pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not	
	conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	
	v) Bakery ovens and confection cookers.	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing,	
	buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber,	Outs for
	concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	Only for equipment
	i) Activity is performed indoors; &	maintenance
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant	
	energy (e.g., blueprint activity, photographic developing and microfiche). 5. Grain, food, or mineral extrusion processes	
	Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient	3
	temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are	
	less than 1,000 pounds per year.	

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less	
Equipment	than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid	
	with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any	
	standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the	
	Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a	5
	petroleum liquid.	3
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are	
	not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding	2
	112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons	
	per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other	
	requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed	150
	550 gallons.	150
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or	2.
	equal to 10 millimeters of mercury (0.19 psia).	2

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities		
Starch Silo, equipped with a bag filter system to recover and return product during filling, used to store powered starch	2	
Jet Corr Corrugator Trim/Waste Cyclone	1	
Pratt Displays Trim/Waste Cyclone	1	

ATTACHMENT B (continued)

GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

	Number of Units (if appropriate)	Applicable Rules		
Description of Emissions Units / Activities		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
Paper Machine (on line) slitting	1	Yes	Yes	
Corrugator JC07	1			Yes
Trim System	1			Yes

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	4
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	10
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	11

ATTACHMENT C

LIST OF REFERENCES

- 1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
- 2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
- 3. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.
- 4. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.
- 5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/ap42/index.html.
- 6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/software/tanks/index.html.
- 7. The Clean Air Act (42 U.S.C. 7401 et seq).
- 8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
- 9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).